## UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13

:

RICHARD GEORGE FASSETT, SR. AND:

RUTH ANN FASSETT.

No. 5:22-BK-01499-MJC

Debtors

ENTRY OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS, RECEIPT OF NOTICES, AND INCLUSION ON NOTICE LIST

TO THE CLERK OF THE BANKRUPTCY COURT:

PLEASE TAKE NOTICE that the undersigned law firm is counsel for a party in interest in the above-captioned case, and, pursuant to Bankruptcy Rules 2002 and 9007, our client respectfully requests that all notices given or required to be given in this case and in any adversary proceedings by the Court, the Debtors, any Creditors' Committee, any Trustee, the United States Trustee, any Trustee subsequently appointed, and/or any other party in interest in this case be given to our client and the undersigned counsel at the addresses and to the persons, telephone numbers and telecopier set forth below. This request includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statement of affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, delivery service, telephone, telegraph, telex, telecopier, or otherwise:

First Citizens Community Bank, f/k/a First Citizens National Bank 15 S. Main Street Mansfield, PA 16933 Attorney and Address Matthew G. Brushwood, Esquire Barley Snyder, LLP 50 North Fifth Street, 2<sup>nd</sup> Floor

Reading, PA 19601

Telephone No: (610) 376-6651

Email Address: mbrushwood@barley.com

PLEASE TAKE FURTHER NOTICE that client intends that neither this notice of appearance nor any later appearance, pleading, claim or suit shall waive (i) client's rights to have orders in non-core matters entered only after de novo review by a District Judge, (ii) client's right to trial by jury in any proceeding so triable in this case or any other cases, controversies or proceedings related to this case, (iii) client's right to have the District Court withdraw the reference in any matter subject to mandatory or discretional withdrawal, (iv) client's right to have the Bankruptcy Court and the District Court abstain in any matter subject to mandatory or discretionary abstention or (v) any other rights, claims, actions, defenses, set-offs or recoupments to which client is or may be entitled under agreements or in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments client expressly reserves.

DATED: September 6, 2022 By: /s/ Matthew G. Brushwood, Esquire

Matthew G. Brushwood, Esquire

Barley Snyder LLP

PA Attorney I.D. No. 310592 50 North Fifth Street, 2<sup>nd</sup> Floor

Reading, PA 19601 (610) 898-7165

I hereby certify that copies of this Entry of Appearance were served September 6, 2022 by ECF notice (electronically) upon:

**Trustee** 

Jack N. Zaharopoulos, Esquire 8125 Adams Drive, Suite A Hummelstown, PA 17036

Paul P. Ackourey, Esquire 9 Marion Street Tunkhannock, PA 18657

<u>Debtor's Attorney</u>

U.S. Trustee Office of United States Trustee 228 Walnut Street, Suite 1190 Harrisburg, PA 17101

We hereby certify that copies of this Entry of Appearance were served by U.S. First Class Mail, postage prepaid, upon the following entities on the date hereof:

<u>Debtor</u>
Richard George Fassett, Sr
Ruth Ann Fassett
76 Mosier Lane
Wyalusing, PA 18853